

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

MAVERICK RECORDING COMPANY, a California joint venture; ARISTA RECORDS, INC., a Delaware corporation; UMG RECORDINGS, INC., a Delaware corporation; WARNER BROS. RECORDS INC., a Delaware corporation; ATLANTIC RECORDING CORPORATION, a Delaware corporation; and BMG MUSIC, a New York general partnership,) CIVIL ACTION No. 04-40167-FDS
Plaintiffs,) The Hon. F. Dennis Saylor
v.)
LISA HAGERTY,)
Defendant.)

[PROPOSED] DEFAULT JUDGMENT AND PERMANENT INJUNCTION

Defendant, Lisa Hagerty (“Defendant”), having failed to plead or otherwise defend in this action and its default having been entered,

Now, upon application of Plaintiffs and declaration in support thereof, it is hereby ORDERED, ADJUDGED, AND DECREED that:

1. Defendant shall pay damages to Plaintiffs for infringement of Plaintiffs' copyrights in the sound recordings listed in Exhibit A to the Complaint, in the total principal sum of Six Thousand Dollars (\$6,000.00).

2. Defendant shall pay Plaintiffs' costs of suit herein in the amount of Two Hundred Four Dollars and Twenty Cents (\$204.20).

3. Defendant shall be and hereby is enjoined from directly or indirectly infringing Plaintiffs' rights under federal or state law in the following copyrighted sound recordings:

- "Greatest Love of All," on album "Whitney Houston," by artist "Whitney Houston" (SR# 60-716);
- "Saturday (Oooh! Oooh!)," on album "Word of Mouf," by artist "Ludacris" (SR# 304-605);
- "Complicated," on album "Let Go," by artist "Avril Lavigne" (SR# 312-786);
- "Go Your Own Way," on album "Rumours," by artist "Fleetwood Mac" (SR# N39857);
- "All You Wanted," on album "The Spirit Room," by artist "Michelle Branch" (SR# 303-732);
- "Honey I'm Home," on album "Come On Over," by artist "Shania Twain" (SR# 243-502);
- "1 Nite Stand," on album "Gift," by artist "Taproot" (SR# 305-703);
- "Right Now," on album "Now You See Inside," by artist "SR-71" (SR# 283-812);

and in any other sound recording, whether now in existence or later created, that is owned or controlled by the Plaintiffs (or any parent, subsidiary, or affiliate record label of Plaintiffs) ("Plaintiffs' Recordings"), including without limitation by using the Internet or any online media distribution system to reproduce (i.e., download) any of Plaintiffs' Recordings, to distribute (i.e., upload) any of Plaintiffs' Recordings, or to make any of Plaintiffs' Recordings available for distribution to the public, except pursuant to a lawful license or with the express authority of Plaintiffs. Defendant also shall destroy all copies of Plaintiffs' Recordings that Defendant has

downloaded onto any computer hard drive or server without Plaintiffs' authorization and shall destroy all copies of those downloaded recordings transferred onto any physical medium or device in Defendant's possession, custody, or control.

DATED: _____ By: _____
Hon. F. Dennis Saylor
United States District Judge